

**QUINTAIROS, PRIETO, WOOD & BOYER, P.A.**

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*SOUTHSTATE BANK, N.A.*

*incorrectly named herein as*

*ATLANTIC CAPITAL BANK*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

YOTTIAK GRAHAM,

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES,  
LLC and ATLANTIC CAPITAL BANK,

Defendants.

Case No. 2:24-cv-00308-JAD-NJK

**MOTION TO EXTEND DEADLINE FOR  
DEFENDANT SOUTHSTATE BANK,  
N.A., INCORRECTLY NAMED HEREIN  
AS ATLANTIC CAPITAL BANK, TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

**[SECOND REQUEST]**

Plaintiff YOTTIAK GRAHAM ("Plaintiff"), by and through his counsel George Haines, Esq. and Gerardo Avalos, Esq. of the FREEDOM LAW FIRM, LLC and Defendant SOUTHSTATE BANK, N.A., incorrectly named herein as ATLANTIC CAPITAL BANK ("Defendant SOUTHSTATE"), by and through its counsel Michael Ayers, Esq. and Alia Najjar, Esq., of QUINTAIROS, PRIETO, WOOD & BOYER, P.A., hereby stipulate as follows:

1. On February 13, 2024, Plaintiff filed his Complaint (ECF No. 1) in this matter.
2. On March 11, 2024, Plaintiff served the Summons and Complaint on Defendant SOUTHSTATE (ECF No. 9).
3. Defendant SOUTHSTATE had twenty-one (21) days from service of the

STIPULATION AND ORDER TO EXTEND DEADLINE FOR DEFENDANT SOUTHSTATE BANK, N.A., INCORRECTLY NAMED HEREIN AS ATLANTIC CAPITAL BANK, TO RESPOND TO PLAINTIFF'S COMPLAINT - 1

1 Summons and Complaint (ECF No. 9) within which to respond to Plaintiff's Complaint (ECF  
2 No. 1), i.e. April 1, 2024.

3 4. Counsel for Plaintiff and Defendant SOUTHSTATE conferred and agreed to  
4 extend Defendant SOUTHSTATE's response deadline to allow the parties to engage in a  
5 dialogue to see if Plaintiff's claims can be resolved.

6 5. In light of these discussions, the parties stipulated to, and the Court granted, a 30-  
7 day extension of time for Defendant SOUTHSTATE to respond to Plaintiff's Complaint, i.e.  
8 May 1, 2024 (ECF No. 8).

9 6. The parties remain engaged in good faith dialogue about potential resolution but  
10 require additional time to discuss a few remaining issues that may enable them to resolve this  
11 case.

12 7. Based on these discussions, Defendant SOUTHSTATE requires additional time  
13 to prepare its responsive pleading.

14 8. Accordingly, Plaintiff and Defendant SOUTHSTATE hereby stipulate to extend  
15 Defendant SOUTHSTATE's deadline to file its responsive pleading in this matter by another 30  
16 days, until and including May 31, 2024.

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27 STIPULATION AND ORDER TO EXTEND DEADLINE FOR DEFENDANT SOUTHSTATE BANK, N.A.,  
28 INCORRECTLY NAMED HEREIN AS ATLANTIC CAPITAL BANK, TO RESPOND TO PLAINTIFF'S  
COMPLAINT - 2

9. Although this is the parties second request, the extension sought will not prejudice any party, including Plaintiff, or the Court, and is not being sought for the purpose of improper delay or for any other improper purpose.

**IT IS SO STIPULATED.**

DATED this 30th day of April, 2024.

DATED this 30th day of April, 2024.

**FREEDOM LAW FIRM, LLC**

**QUINTAIROS, PRIETO, WOOD &  
BOYER, P.A.**

By: /s/ Gerardo Avalos  
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**YOTLIAK GRAHAM**

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**SOUTHSTATE BANK, N.A.,**  
*incorrectly named herein as*  
**ATLANTIC CAPITAL BANK**

**ORDER**

The Stipulation to Extend Deadline for Defendant SOUTHSTATE BANK, N.A., incorrectly named herein as ATLANTIC CAPITAL BANK, to Respond to Plaintiff's Complaint up to and including May 31, 2024, is so ORDERED AND ADJUDGED.

DATED: May 2, 2024

  
UNITED STATES MAGISTRATE JUDGE